

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SARA S. ECHEVARRIA,)	
)	
Plaintiff,)	C.A. NO. 05-284 GMS
)	
v.)	
)	
U-HAUL INTERNATIONAL, INC.,)	TRIAL BY JURY OF
ROGER MAYFIELD, and)	TWELVE DEMANDED
NATIONWIDE GENERAL INSURANCE)	
COMPANY,)	
)	
Defendants.)	

NOTICE OF RECORDS DEPOSITION *

PLEASE TAKE NOTICE that the undersigned will take the deposition of the following on July 29, 2005 at 2:00 p.m. in the offices of Robert J. Leoni, Esquire, of Morgan, Shelsby & Leoni, 131 Continental Drive, Suite 206, Newark, Delaware 19713:

Records Custodian of:

Dr. Amir Mansoor
324 Main Street
Suite 204
Newark, DE 19711

Carl Yacoub, M.D.
550 Stanton-Christiana Road
Suite 101
Newark, DE 19713

Pro Physical Therapy
100 Valley Center Drive
Wilmington, DE 19808

Andrew Barrett, M.D.
1941 Limestone Road
Suite 120
Wilmington, DE 19808

Christiana Care Health Services
501 W. 14th Street
Wilmington, DE 19801

Eric Schwarz, D.O.
726 Yorklyn Road
Hockessin, DE 19707

Lawrence Chang, M.D.
4735 Ogletown-Stanton Road
Suite 1208
Newark, DE 19713

Tony Cucuzzella, M.D.
MAP 2
4735 Ogletown-Stanton Road
Suite 2210
Newark, DE 19713

Family Chiropractic
Tim Ciolkisz
4748 B Limestone Road
Wilmington, DE 19808

Diagnostic Imaging
Brandywine Imaging
3206 Concord Pike
Wilmington, DE 19803

American Radiology Services
1000 Twin C Lane
Suite 101
Newark, DE 19713

Yakov Koyfman, M.D.
4745 Ogletown-Stanton Road
Suite 117
Newark, DE 19713

Records * Duces Tecum - Each deponent is to bring with him documents in his possession pertaining to SARA S. ECHEVARRIA, (date of birth: 9/16/62; Social Security Number - 221-52-6455), including correspondence, reports, office notes, radiological reports, patient information, evaluations reports and if applicable, any and all employment records. **Appearance at the scheduled deposition will be waived if each deponent furnishes the subpoenaed documents to Robert J. Leoni, Esquire, on or before July 29, 2005.**

Respectfully Submitted,

MORGAN SHELSBY & LEONI

/s/ Robert J. Leoni

ROBERT J. LEONI, I.D. #2888
Rleoni@mslde.com

131 Continental Drive, Suite 206
Newark, DE 19713
(302) 454-7430

Attorney for Defendant, Nationwide, Nationwide

Date: 06/09/05

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)	
Defendants.)	

NOTICE OF SERVICE

I HEREBY CERTIFY on this 9th day of June, 2005 two copies of the foregoing Notice of Records Deposition were served upon the parties in this action, by first-class, postage prepaid mail.

Richard A. DiLiberto, Jr., Esquire
YOUNG CONAWAY STARGATT & TAYLOR, LLP
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801

Steven L. Caponi, Esquire
BLANK ROME, LLP
1201 Market Street, Suite 800
Wilmington, DE 19801

Respectfully Submitted,

MORGAN SHELSBY & LEONI

/s/ Robert J. Leoni

ROBERT J. LEONI, I.D. #2888

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